

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES SHELTON

Plaintiff,

v.

ARETE FINANCIAL GROUP et al

Defendant.

Case No. 2:18-cv-02187-CFK

Hon. CHAD F. KENNEY

REO LAW, LLC

By: Bryan Anthony Reo

P.O. Box 5100

Mentor, OH 44061

(Business): (216) 505-0811

(Mobile): (440) 313-5893

(E): Reo@ReoLaw.org

Attorney for James Shelton

MOTION TO ENFORCE SETTLEMENT AND FOR SANCTIONS

Counsel for Plaintiff respectfully moves this honorable Court to enforce the settlement and compel Defendant to pay the \$7,750.00 dollars that Defendant agreed to pay. To date Defendant has not paid the money even though the agreement was made on the record and was the reduced to writing was fully signed. The settlement was agreed to, on the record, on 12/14/2018, before the honorable Judge Chad Kenney. As of 2/5/2019 Plaintiff has not received one penny of the agreed upon \$7,500.00 dollars.

Counsel for Plaintiff has spent approximately three hours attempting to resolve this in regards to emails and phone calls to Defense Counsel and discussing the situation with his client and researching how to proceed. Accordingly, Plaintiff's Counsel requests that Defendant be

sanctioned an amount of money of \$900.00 which is consistent with three hours of Counsel's work at his standard hourly rate of \$300.00 per hour.

RESPECTFULLY SUBMITTED,

/s/ BRYAN ANTHONY REO

REO LAW LLC

By: Bryan Anthony Reo (#0097470)

P.O. Box 5100

Mentor, OH 44061

(Business): (216) 505-0811

(Mobile): (440) 313-5893

(E): Reo@ReoLaw.org

Attorney for Plaintiff James Shelton

Certificate of Service

I, Bryan Anthony Reo, do hereby certify and affirm that a true and accurate copy of the foregoing document was submitted to the Court's Electronic Filing System on February 5, 2019, which should serve said document upon all attorneys of record for the instant civil action:

/s/ BRYAN ANTHONY REO

REO LAW LLC

By: Bryan Anthony Reo (#0097470)

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Attorney for Plaintiff James Shelton

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Attorney for James Shelton

**ORDER GRANTING MOTION TO ENFORCE
SETTLEMENT AND FOR SANCTIONS**

THIS MATTER came to be considered by the Court pursuant to the Plaintiff's Motion to Enforce Settlement and For Sanctions filed by Plaintiff in the above-captioned cause. The Court having considered the Motion and being fully advised of the premises, it is, therefore,

ORDERED and ADJUDGED:

1. That the Plaintiff's Motion to Enforce Settlement is hereby granted.
2. Defendant shall deliver or cause to be delivered, to Plaintiff's Counsel, \$7,750.00 dollars in the form of a check made payable to Reo Law LLC IOLTA, within ____ days from the date of the entry of this order.
3. Additionally, Defendant is hereby sanctioned an amount of _____ payable to Plaintiff's Counsel in the form of a check made payable to Bryan Anthony Reo.

DONE AND ORDERED in Pennsylvania, Eastern District of Pennsylvania, this ____ day
of _____, 2019.

CHAD F. KENNEY , JUDGE- UNITED STATES DISTRICT COURT EASTERN
DISTRICT OF PENNSYLVANIA

Copies to:

Bryan Anthony Reo

Clay Morrow

Norman Valz